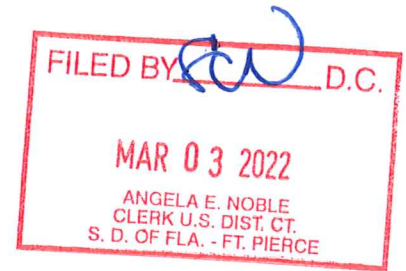


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cr-20081-DPG

**18 U.S.C. § 1029(a)(3)
18 U.S.C. § 1029(a)(4)
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 1029(c)(1)(C)**



UNITED STATES OF AMERICA

v.

**IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA,**

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Access Device Fraud – 18 U.S.C. § 1029(a)(3))

On or about March 17, 2021, in Miami-Dade County, in the Southern District of Florida,
and elsewhere, the defendants,

**IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA,**

did knowingly, and with intent to defraud, possess fifteen or more unauthorized access devices,
that is, debit and credit card account numbers issued to other persons, said conduct affecting
interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3)
and 2.

COUNT 2

(Possession of Access Device-Making Equipment – 18 U.S.C. § 1029(a)(4))

On or about March 17, 2021, in Miami-Dade County, in the Southern District of Florida,
the defendants,

**IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA,**

did knowingly, and with the intent to defraud, have control and custody of, and possess device-making equipment, that is one credit card encoder, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(4) and 2.

COUNTS 3-5

(Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1))

On or about March 17, 2021, in Miami-Dade County, in the Southern District of Florida,
the defendants,

**IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA,**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen or more counterfeit and unauthorized access devices, that is, debit and credit card account numbers issued to other persons, said conflict affecting interstate and foreign commerce, as charged in Count 1 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person, as set forth in each count below:

Count	Means of Identification
3	Name, credit card account number, and personal identification number of “G.M.”
4	Name, credit card account number, and personal identification number of “M.P.”

5	Name, credit card account number, and personal identification number of "J.F."
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In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATIONS

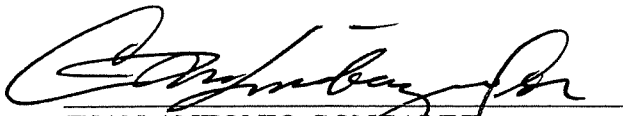
1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for alleging forfeiture to the United States of America of certain property in which the defendants, **IVAN ALONSO FONSECA and ANDY CRESPO TARRASA**, have an interest.

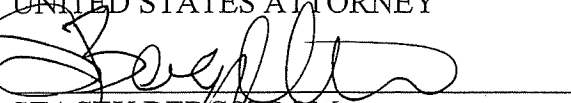
2. Upon conviction of a violation of Title 18, United States Code, Section 1029, as alleged in the Indictment, the defendants, **IVAN ALONSO FONSECA and ANDY CRESPO TARRASA**, shall forfeit to the United States: (a) any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and (b) any personal property used, or intended to be used, to commit such offense, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C) and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2).

A TRUE BILL

FOREPERSON


JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


STACEY BERGSTROM
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 1:22-cr-20081-DPG

v.

IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA**CERTIFICATE OF TRIAL ATTORNEY*****Superseding Case Information:**Defendants/**Court Division:** (Select One)☒ Miami ☐ Key West ☐ FTL
☐ WPB ☐ FTPNew defendant(s) ☐ Yes ☐ NoNumber of new defendants Total number of counts

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) **Yes**
List language and/or dialect Spanish
4. This case will take 4 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one) I 0 to 5 days <input checked="" type="checkbox"/> II 6 to 10 days <input type="checkbox"/> III 11 to 20 days <input type="checkbox"/> IV 21 to 60 days <input type="checkbox"/> V 61 days and over <input type="checkbox"/>	(Check only one) Petty <input type="checkbox"/> Minor <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input checked="" type="checkbox"/>
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6. Has this case previously been filed in this District Court? (Yes or No) **No**
 If yes: Judge Case No.
 (Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) **No**
 If yes: Magistrate Case No.
 Related miscellaneous numbers:
 Defendant(s) in federal custody as of
 Defendant(s) in state custody as of
 Rule 20 from the District of
 Is this a potential death penalty case? (Yes or No) **No**
7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? (Yes or No) **No**
8. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) **No**
9. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **No**

Stacey Bergstrom
Stacey Bergstrom

Assistant United States Attorney

Court ID No. A5502614

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:22-cr-20081-DPG

UNITED STATES OF AMERICA

v.

IVAN ALONSO FONSECA and
ANDY CRESPO TARRASA

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,
JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

BY: Stacey Bergstrom
Stacey Bergstrom
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:22-cr-20081-DPG

PENALTY SHEET

Defendants' Names: IVAN ALONSO FONSECA and ANDY CRESPO TARRASA

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Possession of 15 or more access devices	18 U.S.C. § 1029(a)(3)	10 years' imprisonment, 3 years of SR, \$250,000 fine
2	Possession of device-making equipment	18 U.S.C. § 1029(a)(4)	15 years' imprisonment, 3 years of SR, \$250,000 fine
3-5	Aggravated Identity Theft	18 U.S.C. § 1028A(a)(1)	2 years' imprisonment (consecutive)